

AUG 28 1992

L.E. Carpenter Site
Final FS - July, 1992

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We have reviewed the final feasibility study (FS) for the subject site for issues related to environmental resources, and offer the following comments.

- o Wetlands: It is not clear from the FS whether wetland dewatering, as well as siltation, is a potential impact of the preferred remedial alternatives (RA). An analysis of dewatering for the preferred RAs would provide us with the needed information, to be considered in conjunction with our review of the Wetlands Assessment Report.

We will provide our comments on the Wetland Assessment Report shortly. With the information requested above we will be better able to advise you on the need for mitigation of impacts in the remedial design phase. The proposed remedial action plan (PRAP) should note whether or not such impacts are expected. In this way, the PRAP, and successive documents will accurately reflect the complete list of ARARs. We also recommend that a copy of the report be provided to the Marine and Wetlands Protection Branch for review and comment.

- o Cultural Resources: We are currently reviewing the Stage IA CRS. Apparently it is not known, at this time, which areas of contamination will be excavated. It would be helpful to our analysis if this information were provided as soon as it becomes available, so that we can correlate it with the location of the areas of potential cultural resource sensitivity, and determine if a Stage IB CRS will be necessary. The data will help us to provide you with more timely comments, thereby streamlining the PRAP process.
- o Floodplains: The implications of the floodplain delineation for the various remedial alternatives was not explored in the FS. The PRAP should note that consideration of the 100- and 500-year flood plains must be incorporated into the remedial design. We are reviewing the floodplain delineation in conjunction with the wetland assessment and will comment shortly. At this time Executive Order 11988 (Floodplain Management) remains an unresolved ARAR.

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4. Significant Agricultural Resources: Based on the information provided in the FS regarding the irrigation wells in the site vicinity, the Farmland Protection Policy Act is considered to be a resolved ARAR.

Thank you for this opportunity to comment. If you have any questions, concerning these comments or the information we have requested, please contact Susan Osofsky at x6677.

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